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AIR
PRODUCTS 

5 September 1990

BUREAU OF
FEDERAL CASE MANAGEMENT

SEP 13 1990

New Jersey Department of
Environmental Protection
Division of Hazardous Waste Management
Bureau of Federal Case Management
5th Floor, 401 E. State Street
Trenton, NJ 08625

Attention: Edward Kaup, Case Manager

RE: Air Products and Chemicals, Inc. (APCI)
Comments Regarding the Revised Report of Remedial Investigation (R.I.)
Findings (Volume 1). Prepared For: L.E. Carpenter and Company, Wharton,
New Jersey

Dear Sir:

Having reviewed the above referenced report, we would like to provide comments on behalf of Air Products and Chemicals, Inc. We own an adjacent property that has been affected by past L.E. Carpenter activities, and we want to make certain that all clean-up issues regarding our site are addressed.

First, we would like to clarify the size of the area that APCI owns that may have been affected by past L.E. Carpenter activities. Neither the Air Products drainage ditch nor our fence is our property boundary. We own all of the drainage ditch and a narrow "L" shaped strip of land to the west and south of the drainage ditch. Our fence runs through this strip. This means that contaminants attributable to past L.E. Carpenter activities would have to travel over or through this APCI owned strip of land in order to discharge in the drainage ditch.

Next, we have considered possible L.E. Carpenter sources of contamination of this strip of land and the drainage ditch and the extent of such contamination. There are at least four potential sources of L.E. Carpenter contaminants to this area:

1. The L.E. Carpenter permitted discharge 001 ("Northern Drainage Feature") which is piped under the railroad right-of-way, across our property and into the head of the ditch.
2. Discharge 002 which previously ran across the surface of the western bank and into the ditch.



3. The contaminant plume which has been detected on L.E. Carpenter's site and which, to date, has not been fully delineated.
4. The starch drying beds.

Based on the location of the area that we own, the potential sources of contaminants, the direction of groundwater flow and the analytical data to date, we find that some of the statements and conclusions drawn in the R.I. Report are misleading. For instance, we do not agree with the statement on Page 13 which reads: "Based on the findings of this investigation, it is concluded that there is no migration of volatile organic compounds from L.E. Carpenter property to off-site areas." We contend that the entire length of our drainage ditch, from the head to the Rockaway River, and our narrow strip of land between the ditch and the L.E. Carpenter property are potentially contaminated. In addition, both sides or banks are potentially contaminated from contact with contaminated water. Also, it has not been shown conclusively that the drainage ditch marks the lateral extent of all contaminant migration, either sinking or floating. The seep that emanated from the eastern drainage ditch bank, as a result of the installation of MW-13s and MW-13i, was analyzed and found to contain xylene.

Additional examples of statements we do not agree with include:

Page 82 - "At present, no V.O. compounds attributable to L.E. Carpenter have been detected in wells at the two properties." (Referring to APCI and Wharton Enterprises)

Page 90-92 - "MW-13s, located on the Air Products property, contains V.O. compounds. However, except for methylene chloride which is present at the site and was detected in the method blanks, these compounds are primarily chlorinated in nature and do not appear to be related to site conditons."

The low levels of organic compounds found in MW-13s on APCI property have in fact all been detected on Carpenter's property during NJDEP testing of groundwater in 1980 and 1981, or are degradation products of compounds detected on Carpenter's property.

Some of the statements that refer to the Air Products site are misleading. These include:

Page 15 - "A large compressed gas facility (APCI) borders the site to the northwest."

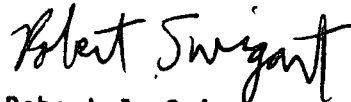
Page 82 - "The primary areas of off-site concern are the Wharton Enterprises and Air Products properties and its impoundment zone and tank farm."

Air Product's Wharton, New Jersey facility is an air separation plant located to the northeast (not "northwest") of the L.E. Carpenter facility. We separate ambient air into its components, oxygen and nitrogen, using a cryogenic liquification process. Our "tank farm", as the R.I. suggests, consists of a liquid oxygen tank and a liquid nitrogen tank. We do not have an "impoundment zone". The R.I. must have been referring to where our two drainage ditches join in a small pool before heading to the Rockaway River.

As APCI may well go through the ECRA process someday, we want to make sure that the Carpenter clean-up is complete. We do not want to be held responsible or to pay for the clean-up of contaminants related to L. E. Carpenter activities either now or in the future. Therefore, we believe that further studies should address the entire length and both banks of the drainage ditch, the two wastewater Outfalls (001 and 002) and the strip of land between the drainage ditch and the L.E. Carpenter property.

Sincerely,

Air Products and Chemicals, Inc.



Robert J. Swigart
Environmental Coordinator

RJS/sah
0536E

cc: Cristopher R. Anderson
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